

REMARKS

Claims 12-30 were previously pending in the application. By this Amendment, Claims 13, 19-21, 23 and 24 are amended, Claims 12, 14-18, 22, 29 and 30 are canceled without prejudice, new Claims 31-40 have been added, and Claims 25-28 remain unchanged. Claims 13, 19-21, 23-28 and 31-40 are now pending in the application.

The Office Action makes the September 26, 2008 Restriction Requirement final and withdraws claims 15-17, 22, 29 and 30 from consideration. Accordingly, by this Amendment, claims 15-17, 22, 29 and 30 have been cancelled.

FORMAL MATTERS

The Office Action rejects claims 12-14, 18-21 and 23-28 under 35 U.S.C. § 112, second paragraph. By this Amendment, independent claim 12 has been cancelled. Various other claims have been amended to obviate the rejection under § 112. Accordingly, withdrawal of the rejection under § 112 is respectfully requested.

THE CLAIMS ARE ALLOWABLE OVER BOVED AND BERTOLDO

The Office Action rejects claims 12-14, 21, 23, 25, 26 and 28 under 35 U.S.C. § 103(a) over Boved (European Patent No. 789104), in view of Bertoldo (European Patent No. 961374). As noted above, claims 12 and 14 have been cancelled. Accordingly, the rejection of these claims is moot. With respect to the remaining claims, the rejection is respectfully traversed.

The Boved reference discloses a system for joining two halves of a plastic tub of a washing machine. As shown in Figure 1 of Boved, the closure

mechanism includes axial projections 7 formed on one half of the plastic tank, the axial projections including triangular shaped flanges 11 at distal ends. The other half of the plastic tank includes a plurality of radial cavities 8 which receive the radial projections 7. A projection 10 on the radial cavities 8 lock against the triangular-shaped flanged ends 11 of the radial projections 7 to lock the first half of the tank to the second half of the tank.

The Bertoldo reference discloses an electrical connector box which encloses electrical wiring. The box includes a main body portion 20 and a cover plate 13. The cover plate 13 is attached to the main body 20 with a plurality of pins 68. As shown in Figures 4 and 5, stop tabs 50 on the cover 13 extend down into circular 36 holes in the main body portion 20. Distal ends 56 of the stop tabs 50 can expand outward against an enlarged diameter portion 36 of the holes. Insertion of the pins 68 into an interior of the stop tabs 50 forces the distal ends 56 of the stop tabs outward to hold the cover 13 on the main body portion 20.

The Office Action asserts that it would have been obvious to one of ordinary skill in the art to replace the closure mechanism disclosed in Boved with the closure mechanism disclosed in Bertoldo. For the reasons discussed below, it is respectfully submitted that one of ordinary skill in the art would not have made such a substitution.

The Bertoldo mechanism is intended to be used on small electrical connector boxes. These connector boxes merely enclose electrical wiring. The cover of an electrical connector box as disclosed in Bertoldo does not experience any significant forces which would tend to remove the cover from the main body of the electrical connector box. As a result, the closure mechanism of such a electrical connector box does not need to provide a great deal of securing force. And, in fact, Bertoldo's closure mechanism is not likely to provide a great deal of fastening force. If any significant amount of force were to push the cover of the Bertoldo electrical box upward, the closure mechanism would be unlikely to hold the cover on the main body.

The present application is directed to a closure mechanism which is used to connect two halves of the lye container (or wash tub) of a washing machine together. The two halves of the lye container must be water-tight when they are joined together. In addition, the forces which tend to force the two halves apart are significant. The lye container will be filled with a mixture of water and washing fluids, and may also contain a load of laundry. Furthermore, when the washing machine is in operation, and a rotating drum within the lye container is rotating, the lye container will be subjected to significant amounts of vibration. All of these forces tend to cause the two halves of the lye container to separate. For all these reasons, it is very important that the closure mechanism used to attach the two halves of the lye container together be extremely secure and never allow fluids within the lye container to leak.

It is respectfully submitted that one of ordinary skill in the art, viewing the Boved and Bertoldo references, would have had no motivation to substitute the Bertoldo closure mechanism for the closure mechanism shown in Boved. As noted above, the Bertoldo closure mechanism would be highly unlikely to provide the degree of fixation rigidity required for the lye container of a washing machine. The Bertoldo mechanism would simply not provide sufficient mechanical strength for this purpose. For at least these reasons, it is respectfully submitted that the combination is improper, and that the rejection should be withdrawn on these grounds alone.

Moreover, certain rejected claims recite features which are not disclosed in either Boved or Bertoldo. For instance, claim 21 recites a concentric protective projection which is formed on the second container portion around a first end of the axial through-hole opposite the outer end of the pin. Claim 21 recites that the concentric protective projection protects the dowel when it is held at a first end of the axial through-hole (the open or un-fixed position). Neither Boved nor Bertoldo disclose or suggest the claimed concentric protective

projection. It is respectfully submitted that the dependent claims are also allowable for the additional features which they recite that are not disclosed in Boved or Bertoldo.

In view of the foregoing, withdrawal of the rejection of claims 13, 21, 23, 25, 26 and 28 is respectfully requested.

THE CLAIMS ARE ALLOWABLE OVER BOVED, BERTOLDO AND MOREL

The Office Action rejects claims 18 and 24 under 35 U.S.C. 103(a) over Boved, in view of Bertoldo, and further in view of Morel (US Patent No. 4,276,806). By this Amendment, claim 18 has been cancelled. With respect to claim 24, the rejection is respectfully traversed.

As noted above, the combination of Boved and Bertoldo is improper. For at least this reason, it is respectfully submitted that the rejection should be withdrawn.

In addition, claim 24 recites additional features which are also not disclosed or suggested by the references of record. Claim 24 depends from claim 23 and further recites that the first radial extension on the first container portion includes stops formed on the inner diameter of the opening near the rear section of the opening, the stops limiting an insertion depth of the pin in the opening.

The Office Action asserts that Morel discloses the stops recited in claim 24. Specifically, the Office Action asserts that a radial step between the small diameter portion 14 and large diameter portion 15 of the hole in the plate shown in Morel constitutes the claim stops.

Applicants note that this step between the two different diameter portions interacts with the projections 11 on a collar 6 to prevent the collar from being removed from the hole in the plate. However, the step between the two different diameter portions does not limit an insertion depth of any pin within the hole.

Because Morel fails to disclose or suggest a stop that limits the insertion depth of a pin into an opening, it is respectfully submitted that claim 24 is allowable over the combination of Boved, Bertoldo and Morel. Accordingly, for this additional reason, withdrawal of the rejection of claim 24 is respectfully requested.

THE CLAIMS ARE ALLOWABLE OVER BOVED, BERTOLDO AND IGUCHI

The Office Action rejects claims 19, 20 and 27 under 35 U.S.C. § 103(a) over Boved, in view of Bertoldo, and further in view of Iguchi (US Patent No. 4,874,276). The rejection is respectfully traversed.

As noted above, it is respectfully submitted that the combination of Boved and Bertoldo is improper. For at least these reasons, it is respectfully submitted that the combination of Boved, Bertoldo and Iguchi is also improper. For this reason, withdrawal of the rejection is respectfully requested.

NEW CLAIMS 31- 40

By this Amendment, claims 31-40 are added to the application. New claim 31 is directed to a lye container for a washing machine. Claims 32-40 depend from new claim 31. It is respectfully submitted that new claims are allowable for reasons similar to those discussed above, and for the additional features which these claims recite.

CONCLUSION

In view of the above, entry of the present Amendment and allowance of the application are respectfully requested. If the Examiner has any questions regarding this amendment, the Examiner is requested to contact the undersigned. If an extension of time for this paper is required, petition for extension is herewith made.

Respectfully submitted,



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